

OFFICE OF THE STANDING CHAPTER 13 TRUSTEE
 7001 Boulevard 26, Suite 150
 North Richland Hills, TX 76180
 (817) 916-4710 Phone
 (817) 916-4770 Fax

UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF TEXAS
 FORT WORTH DIVISION

IN RE:	§	CASE NO. 16-44770-MXM-13
	§	
CILFREDO GARCES JR. AND	§	
TRACIE MARIE GARCES	§	
	§	
DEBTOR(S)	§	

**REPLY TO RESPONSE TO NOTICE TO DEEM MORTGAGE CURRENT OR, ALTERNATIVELY,
 NOTICE OF AMOUNT DEEMED NECESSARY TO CURE
 (Mid Case Mortgage Notice per L.B.R. 3002.1-1)**

NOW COMES, Pam Bassel, Standing Chapter 13 Trustee, and files this Reply to Response to Notice to Deem Mortgage Current or, Alternatively, Notice of Amount Deemed Necessary to Cure (Mid Case Mortgage Notice per L.B.R. 3002.1-1 and would respectfully show the Court as follows:

1. The Trustee is unable to admit or deny whether U.S. Bank Trust National Association, as Trustee of the Igloo Series III Trust ("Mortgage Lender") is entitled to receive payments pursuant to a promissory note on the subject property and therefore makes a QUALIFIED DENIAL.
2. The Trustee ADMITS that the amount remaining necessary to cure the pre-petition mortgage arrears is \$19,605.64.
3. The Trustee has paid \$5,498.28 on the pre-petition arrearage claim which was originally \$25,103.92, and the Mortgage Lender has received and applied these proceeds per its Response.
4. The Trustee DENIES that the Debtor is due for the March 1, 2018 post-petition monthly mortgage payment and all subsequent payments for a total post-petition default of \$20,651.55.
5. The Trustee has made the following post-petition monthly mortgage payments to the Mortgage Lender totaling \$22,028.32 as of the date of this pleading (all payments have cleared):

Disb Date	Check Number	Payee Name	Type	Amount
6/26/2018	3073640	BSI FINANCIAL SERVICES	Disbursement to Creditor - Continuing Debt	\$1,376.77
4/30/2018	3071352	BSI FINANCIAL SERVICES	Disbursement to Creditor - Continuing Debt	\$1,376.77
3/27/2018	3070235	BSI FINANCIAL SERVICES	Disbursement to Creditor - Continuing Debt	\$1,376.77
2/27/2018	3069165	BSI FINANCIAL SERVICES	Disbursement to Creditor - Continuing Debt	\$1,376.77
1/30/2018	3068043	BSI FINANCIAL SERVICES	Disbursement to Creditor - Continuing Debt	\$5,507.08
9/26/2017	5007987	WELLS FARGO BANK - UCI EFT	Disbursement to Creditor - Continuing Debt	\$1,376.77
8/29/2017	5007927	WELLS FARGO BANK - UCI EFT	Disbursement to Creditor - Continuing Debt	\$2,753.54
7/31/2017	5007870	WELLS FARGO BANK - UCI EFT	Disbursement to Creditor - Continuing Debt	\$2,753.54
5/30/2017	5007748	WELLS FARGO BANK - UCI EFT	Disbursement to Creditor - Continuing Debt	\$1,376.77
4/25/2017	5007697	WELLS FARGO BANK - UCI EFT	Disbursement to Creditor - Continuing Debt	\$2,753.54

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that the Court APPROVE the Trustee's Notice to Deem Mortgage Current or, Alternatively, Notice of Amount Deemed Necessary to Cure (Mid Case

Mortgage Notice per L.B.R. 3002.1-1, DEEM the amount deemed necessary to cure pre-petition mortgage arrears \$19,605.64, DEEM the Debtor current on post-petition monthly mortgage payments through July 2018, and for such other and further relief to which the Trustee may be entitled at law or in equity.

Respectfully submitted,

By: /s/ Ethan S. Cartwright

Ethan S. Cartwright, Staff Attorney

Bar No. 24068273

PAM BASSEL STANDING CHAPTER 13 TRUSTEE

Bar No. 01344800

7001 Boulevard 26, Suite 150

North Richland Hills, TX 76180

(817) 916-4710 Phone

(817) 916-4770 Fax

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served by me on the date of filing on the United States Trustee, Debtor, Debtor's Counsel, and the parties listed below by United States First Class Mail and/or electronically by the Court to those parties entitled to electronic notice.

/s/ Ethan S. Cartwright

Ethan S. Cartwright

KRISTIN A. ZILBERSTEIN, ESQ.
LAW OFFICES OF MICHELLE GHIDOTTI
1920 OLD TUSTIN AVENUE
SANTA ANA, CA 92705

WELLS FARGO BANK
DEFAULT DOC PROCESSING N9286-01Y
1000 BLUE GENTIAN RD
EAGAN, MN 55121-7700